

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HAITIAN-AMERICANS UNITED, INC.,)
BRAZILIAN WORKER CENTER,)
CHELSEA COLLABORATIVE, INC. and)
CENTRO PRESENTE,)
Plaintiffs,)
v.) Case No. 20-11421-DPW-BMS-PBS
DONALD J. TRUMP, President of the)
United States in his Official Capacity,)
UNITED STATES DEPARTMENT OF)
COMMERCE, UNITED STATES)
BUREAU OF THE CENSUS, STEVEN)
DILLINGHAM, Director of the U.S.)
Census Bureau in his Official Capacity,)
and WILBUR ROSS, Secretary of the)
Department of Commerce in his Official)
Capacity,)
Defendants.)

)

AFFIDAVIT OF LAUREN ALEXA SAMPSON

I, Lauren Alexa Sampson, hereby depose and state as follows:

1. I am a member of the Bar of the Commonwealth of Massachusetts and a Staff Attorney with Lawyers for Civil Rights. Lawyers for Civil Rights represents Plaintiffs Haitian-Americans United, Inc., Brazilian Worker Center, Chelsea Collaborative, Inc. and Centro Presente in this action. I make this Affidavit in support of Plaintiffs' Motion for Limited Expedited Discovery. The facts set forth in this Affidavit are based on my personal knowledge.

2. A true and correct copy of the following document, obtained via PACER, is attached to this Affidavit at Exhibit 1: Defendants' Motion to Dismiss and Opposition to

Plaintiff's Motion for Partial Summary Judgment (ECF No. 59), in *Common Cause v. Trump*, No. 1:20-cv-02023-CRC-GGK-DLF (D.D.C. Sept. 2, 2020).

3. A true and correct copy of the following document, obtained via PACER, is attached to this Affidavit at Exhibit 2: Memorandum of Law in Support of Defendants' Motion to Dismiss and in Opposition to Plaintiffs' Motion for Partial Summary Judgment or Preliminary Injunction (ECF No. 118), in *New York v. Trump*, No. 20 Civ. 5770 (JMF) (S.D.N.Y. Aug. 19, 2020).

4. A true and correct copy of the following document, obtained via PACER, is attached to this Affidavit at Exhibit 3: Defendants' Notice of Motion and Motion to Dismiss, or in the Alternative, Motion for Partial Summary Judgment (ECF No. 84), in *San Jose v. Trump*, Case No. 5:20-cv-05167-LHK-RRC-EMC (N.D. Cal. Sept. 10, 2020).

5. A true and correct copy of the following document, obtained via PACER, is attached to this Affidavit at Exhibit 4: Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment or a Preliminary Injunction (ECF No. 36), in *Useche v. Trump*, Case No. 8:20-cv-2225-PX (D. Md. Sept. 1, 2020).

6. A true and correct copy of the following document, obtained via counsel for the plaintiffs in *New York v. Trump*, is attached to this Affidavit at Exhibit 5: Transcript of Proceedings before Hon. Richard S. Wesley, Hon. Peter W. Hall, and Hon. Jesse M. Furman, on September 3, 2020, at 10:00 a.m., in *New York v. Trump*, No. 20 CV 5770 (RCW) (PWH) (JMF) (S.D.N.Y.).

7. A true and correct copy of the following document, obtained via PACER, is attached to this Affidavit at Exhibit 6: Defendants' Memorandum in Support of Motion to Stay

(ECF No. 172), in *New York v. Trump*, Case No. 20-CV-5770 (RCW) (PWH) (JMF) (S.D.N.Y Sept. 16, 2020).

8. A true and correct copy of the following document, which I obtained via the Internet on September 29, 2020 (at <https://apnews.com/article/san-jose-california-courts-census-2020-21ed23c0431f4711289f3ceed91df8ef>), is attached to this Affidavit at Exhibit 7: Mike Schneider, “U.S. official: 2020 Census to end Oct. 5 despite court order,” Associated Press (Sept. 28, 2020).

Signed under the penalties of perjury this 30th day of September, 2020.

/s/ Lauren Alexa Sampson
Lauren Alexa Sampson

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2020, the within document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent by mail to those indicated as non-registered participants on September 30, 2020.

/s/ Patrick M. Curran, Jr.
Patrick M. Curran, Jr.

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